

Dear FCC,

I am writing in connection with the FCC's proposals in ET docket 04-37 to amend its Part 15 rules to adopt new requirements and measurement guidelines for Access BPL systems that provide broadband access over electric utility power lines.

There is an abundance of evidence that the risk of interference from BPL is significantly greater than BPL proponents claim. While I am encouraged by the Commission's affirmation that licensed services must be protected from harmful interference from BPL, I am concerned that this principle will not be honored in practice.

Specifically, the FCC's proposed interference mitigation requirements do not provide credible protection from harmful interference. The FCC's proposals also appear to ignore the problems that will arise when Amateur Radio transmissions disrupt BPL systems.

While Commission staff has spoken of requiring that the BPL industry maintain a database to assist the public in locating BPL system operators, the proposals contained in the NPRM contain no such requirement. I believe that such a properly-maintained, publicly accessible database is absolutely essential to protection of existing licensed services.

It is also essential that the FCC establish objective performance standards for BPL interference mitigation. For credible protection of licensed services, the rules must require that interference complaints be resolved immediately, and impose severe penalties for failure to maintain the database and for failure to resolve complaints in real time.

Thank you for your consideration.

Peter W. Offutt, Ph.D
KB9YYD